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**ATTORNEYS FOR NEXPOINT REAL ESTATE PARTNERS, LLC,  
f/k/a HCRE PARTNERS, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>	§	
	§	<b>Chapter 11</b>
<b>HIGHLAND CAPITAL</b>	§	
<b>MANAGEMENT, L.P.,</b>	§	<b>Case No. 19-34054-SGJ-11</b>
	§	
<b>Debtor.</b>	§	
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<b>HIGHLAND CAPITAL</b>	§	
<b>MANAGEMENT, L.P.,</b>	§	
	§	
<b>Movant,</b>	§	
	§	<b>Contested Matter</b>
<b>v.</b>	§	
	§	
<b>NEXPOINT REAL ESTATE</b>	§	
<b>PARTNERS, LLC, F/K/A HCRE</b>	§	
<b>PARTNERS, LLC,</b>	§	
	§	
<b>Respondent.</b>	§	

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**OBJECTIONS TO DEBTOR'S DESIGNATED EXHIBITS**

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Pursuant to the Amended Stipulation and Proposed Scheduling Order Concerning Proof of Claim No. 146 Filed By HCRE Partners, LLC [Dkt. No. 3356] and the Court’s Order Approving Amended Stipulation and Proposed Scheduling Order Concerning Proof of Claim No. 146 Filed By HCRE Partners, LLC [Dkt. No. 3368], and the agreements of the parties, NexPoint Real Estate Partners, LLC f/k/a HCRE Partners, LLC (“NREP” or “Claimant”) files this, its Objections to Debtor’s Designated Exhibits, and respectfully states as follows:

**OBJECTIONS TO EXHIBITS**

Exh.	Description	Objection
62	Transcript of August 11, 2021 Deposition of Rob Wills	Relevance (402) Hearsay (802)
63	Transcript of August 13, 2021 Deposition of Mark Patrick	Relevance (402) Hearsay (802)
64	Transcript: Kehr, 2021-9-16	Relevance (402) Hearsay (802)
64	Transcript: Transcript of September 16, 2021 Deposition of Robert Kehr	Relevance (402) Hearsay (802)
65	Transcript: Transcript of September 17, 2021 Deposition of Ben Selman	Relevance (402) Hearsay (802)
66	Transcript: Transcript of August 2, 2022 Deposition of Mark Patrick	Relevance (402) Hearsay (802)
70	Transcript of October 4, 2022 Deposition of James Dondero	Relevance (402) Hearsay (802)
71	Transcript of October 11, 2022 Deposition of HCRE/Matt McGraner	Relevance (402) Hearsay (802)
72	Debtor’s Notice of Rule 30(b)(6) Deposition to NexPoint Real Estate Partners, LLC f/k/a HCRE Partners, LLC [Docket No. 1898]	Relevance (402)
73	Debtor's Amended Notice of Rule 30(b)(6) Deposition to HCRE Partners, LLC [Docket No. 1965]	Relevance (402)

Exh.	Description	Objection
74	Debtor's Third Amended Notice of Rule 30(b)(6) Deposition to HCRE Partners, LLC [Docket No. 2134]	Relevance (402)
75	Debtor's Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief [Docket No. 2196]	Relevance (402)
76	Debtor's Memorandum of Law in Support of Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief [Docket No. 2197]	Relevance (402)
77	Declaration of John A. Morris in Support of the Debtor's Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief [Docket No. 2198]	Relevance (402)
78	Response to Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC [Docket No. 2278]	Relevance (402)
79	Debtor's Preliminary Reply in Further Support of Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief [Docket No. 2294]	Relevance (402)
80	Highland's Supplemental Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief [Docket No. 2893]	Relevance (402)
81	Highland's Memorandum of Law in Support of Supplemental Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief [Docket No. 2894]	Relevance (402)
82	Declaration of Kenneth H. Brown in Support of Supplemental Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief [Docket No. 2895]	Relevance (402)
83	Response and Brief in Opposition to Highland's Supplemental Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and Related Relief [Docket No. 2927]	Relevance (402)

Exh.	Description	Objection
84	Supplemental Appendix in Support of NexPoint Real Estate Partners, LLC's Response and Brief in Opposition to Debtor's Supplemental Motion to Disqualify Wick Phillips Gould & Martin, LLP [Docket No. 2928]	Relevance (402)
85	Highland's Reply in Support of Supplemental Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners	Relevance (402)
86	Hearing Held on November 30, 2021 re: Highland's Supplemental Motion to Disqualify Wick Phillips Gould & Martin, LLP as Counsel to HCRE Partners, LLC and for Related Relief (No Image Available) [Docket No. 3071]	Relevance (402)
93	SE Multifamily Holdings: Schedule of Distributions	Authenticity (901) Foundation Not produced/bated
96	Email chain with Key Bank dated September 27, 2018 re: Return of 750K	Authenticity (901) Not produced/bated
97	Email from Mathew Goetz to David Klos and Kristin Hendrix dated November 16, 2018 re Fee Rebate	Authenticity (901) Not produced/bated
98	Email from Mathew Goetz to David Klos and Kristin Hendrix dated November 16, 2018 re wire from Key Bank	Authenticity (901) Not produced/bated
99	Email from Kristin Hendrix to Corporate Accounting dated November 16, 2018 re wire from Key Bank	Authenticity (901) Not produced/bated
100	Email from Kristin Hendrix to David Klos and Corporate Accounting dated November 16, 2018 re wire from Key Bank	Authenticity (901) Not produced/bated
101	Email from Kristin Hendrix to David Klos and Corporate Accounting dated November 16, 2018 re confirmation of wire	Authenticity (901) Not produced/bated
102	Email chain dated November 19, 2018 re Opening Balance Sheets	Authenticity (901) Not produced/bated

Dated: October 29, 2022

/s/ Charles W. Gameros, Jr.  
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**ATTORNEYS FOR  
NEXPOINT REAL ESTATE PARTNERS, LLC,  
F/K/A HCRE PARTNERS, LLC**

**CERTIFICATE OF SERVICE**

This is to certify parties which have so registered with the Court, including counsel for the Debtor, the United States Trustee, and all persons or parties requesting notice and service shall receive notification of the foregoing via the Court's ECF system, and are considered served pursuant to the Administrative Procedures incorporated into the Order Adopting Administrative Procedures for Electronic Case Filing, General Order 2003-01.2.

/s/ Charles W. Gameros, Jr., P.C.  
Charles W. Gameros, Jr., P.C.